

EXHIBIT “A”

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF Queens

-----X
Sandra Alas Beltran

Plaintiff/Petitioner,

- against -

Index No.

Hartman A. Walker and EAN Holdings
Defendant/Respondent.

711411/2021

-----X
NOTICE OF ELECTRONIC FILING
(Mandatory Case)
(Uniform Rule § 202.5-bb)

You have received this Notice because:

- 1) The Plaintiff/Petitioner, whose name is listed above, has filed this case using the New York State Courts E-filing system ("NYSCEF"), and
- 2) You are a Defendant/Respondent (a party) in this case.

● **If you are represented by an attorney:**

Give this Notice to your attorney. (Attorneys: see "Information for Attorneys" pg. 2).

● **If you are not represented by an attorney:**

You will be served with all documents in paper and you must serve and file your documents in paper, unless you choose to participate in e-filing.

If you choose to participate in e-filing, you must have access to a computer and a scanner or other device to convert documents into electronic format, a connection to the internet, and an e-mail address to receive service of documents.

The benefits of participating in e-filing include:

- serving and filing your documents electronically
- free access to view and print your e-filed documents
- limiting your number of trips to the courthouse
- paying any court fees on-line (credit card needed)

To register for e-filing or for more information about how e-filing works:

- visit: www.nycourts.gov/efile-unrepresented or
- contact the Clerk's Office or Help Center at the court where the case was filed. Court contact information can be found at www.nycourts.gov

To find legal information to help you represent yourself visit www.nycourthelp.gov

**Information for Attorneys
(E-filing is Mandatory for Attorneys)**

An attorney representing a party who is served with this notice must either:

- 1) immediately record his or her representation within the e-filed matter on the NYSCEF site www.nycourts.gov/efile ; or
- 2) file the Notice of Opt-Out form with the clerk of the court where this action is pending and serve on all parties. Exemptions from mandatory e-filing are limited to attorneys who certify in good faith that they lack the computer hardware and/or scanner and/or internet connection or that they lack (along with all employees subject to their direction) the knowledge to operate such equipment. [Section 202.5-bb(e)]

For additional information about electronic filing and to create a NYSCEF account, visit the NYSCEF website at www.nycourts.gov/efile or contact the NYSCEF Resource Center (phone: 646-386-3033; e-mail: efile@nycourts.gov).

Dated: 5/19/21

Hermann P. Gruber
Name

Steinberg and Gruber, PC
Firm Name

300 Garden City Plaza, Ste 218
Address

Garden City, NY 11530

516-463-0999
Phone

h.gruber@steinbergandgruber.com
E-Mail

To: Via VTL
Hartman Walker, Jr
75 Lark Drive
South River, NJ 0882

Via VTL
EAN Holdings
14002 E. 21st Street
Tulsa, OK 74134

6/6/18

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF QUEENS

Index No.:
Date Purchased:

-----X
SANDRA ALAS BELTRAN,

SUMMONS

Plaintiffs,

Plaintiff designates Queens
County as the place of trial.

-against-

HARTMAN A. WALKER, JR. and
EAN HOLDINGS

The basis of venue is:
Plaintiff residence

Defendants,

Plaintiffs reside at:
136-31 62nd Avenue
Flushing, NY 11367


-----X

County of Queens

To the above named Defendants:

You are hereby summoned to answer the complaint in this action, and to serve a copy of your answer, or, if the complaint is not served with this summons, to serve a notice of appearance on the Plaintiff's attorney(s) within twenty days after the service of this summons, exclusive of the day of service, where service is made by delivery upon you personally within the state, or, within 30 days after completion of service where service is made in any other manner. In case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded in the complaint.

Dated: Garden City, New York
May 12, 2021


HERMANN P. GRUBER
STEINBERG & GRUBER, P. C.
Attorneys for Plaintiff(s)
300 Garden City Plaza, Ste. 218
Garden City, New York 11530
(516) 663-0999

TO:

Via VTL
Hartman Walker, Jr.
75 Lark Drive
South River, NJ 08882

Via VTL
EAN HOLDINGS
14002 E. 21st Street
Tulsa, OK 74134

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF QUEENS

-----X
SANDRA ALAS BELTRAN,

Plaintiff,

-against-

HARTMAN A. WALKER, JR. and
EAN HOLDINGS,

Defendants,
-----X

Index No.:

Date Purchased:

VERIFIED COMPLAINT

Plaintiff, by her attorneys, **STEINBERG & GRUBER, P. C.**, complaining of the Defendants, respectfully alleges, upon information and belief:

1. At all times herein mentioned, Plaintiff was, and still is, a resident of the County of Queens, State of New York.

2. At all times herein mentioned, Defendant, **EAN HOLDINGS** was the owner of a 2019 Nissan bearing Oklahoma State plate number KZK5897.

3. At all times herein mentioned, Defendant, **HARTMAN A. WALKER, JR.**, was the operator the aforementioned motor vehicle bearing Oklahoma State plate number KZK5897.

4. At all times herein mentioned, Defendant, **HARTMAN A. WALKER, JR.**, operated the aforementioned motor vehicle with the permission, knowledge and consent of Defendant, **EAN HOLDINGS**.

5. At all times herein mentioned, Defendant, **HARTMAN A. WALKER, JR.**, managed, maintained and controlled the aforesaid motor vehicle.

6. At all times herein mentioned, Defendant, **EAN HOLDINGS**, managed, maintained and controlled the aforesaid motor vehicle.

7. Upon information and belief and at all times hereinafter mentioned the plaintiff, **SANDRA ALAS BELTRAN**, was the operator of a 2014 Toyota motor vehicle bearing New York State registration number JLA3322 and owned by **KENIA V. LOPEZ**.

8. At all times herein mentioned, Linden Place and Whitestone Expressway in the County of Queens, State of New York, were public roadways, streets and/or thoroughfares.

9. On July 27, 2020, at or about 3:20 pm, the motor vehicle owned by defendant, **EAN HOLDINGS**, and operated by defendant, **HARTMAN A. WALKER, JR.**, came into contact with the motor vehicle operated by Plaintiff, **SANDRA ALAS BELTAN**.

10. On July 27, 2020, at the aforesaid location, the defendant, **HARTMAN A. WALKER, JR.**, did operate his motor vehicle in a reckless, careless and negligent manner so as to collide with the motor vehicle operated by **SANDRA ALAS BELTAN** in causing the plaintiff to sustain the serious personal injuries as hereinafter alleged.

11. The plaintiff did in no way contribute to the occurrence and was free of comparative negligence.

12. The plaintiff is a "covered person" as defined by §5102(j) of the Insurance Law of the State of New York.

13. As a result of the foregoing, plaintiff suffered a serious personal injury as defined by §5102(d) of the Insurance Law of the State of New York.

14. As a result of the foregoing, plaintiff, has suffered economic loss greater than basic economic loss as defined in §5102(a) of the Insurance Law of the State of New York.

15. By reason of the foregoing plaintiff is entitled to recover for non-economic loss as defined in §5102(c) of the Insurance Law of the State of New York.

16. This action falls within one or more of the exceptions set forth in CPLR 1602.

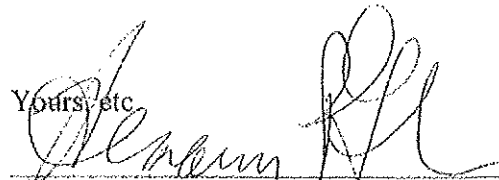
17. Solely as a result of the foregoing, the plaintiff was caused to sustain serious, severe and painful bodily injuries, was rendered sick, sore, lame and disabled, sustained severe shock to her nervous system, was caused to suffer severe mental anguish was and continues to be unable to attend to her usual occupations and duties, was caused to incur and continues to incur expenses for care and medical treatment; and was otherwise damaged.

18. Solely as a result of the foregoing, the plaintiff has been damaged in an amount which exceeds the jurisdictional limits of all lower courts which would otherwise have jurisdiction over this action.

WHEREFORE, Plaintiff(s) demand(s) judgment against the Defendants herein, in a sum exceeding the jurisdictional limits of all lower courts which would otherwise have jurisdiction, together with the costs and disbursements of this action.

Dated: Garden City, New York
May 12, 2021

Yours, etc.


HERMANN P. GRUBER
STEINBERG & GRUBER, P. C.
Attorneys for Plaintiff(s)
300 Garden City Plaza, Ste. 218
Garden City, New York 11530
(516) 663-0999

TO: Via VTL
Hartman Walker, Jr.
75 Lark Drive
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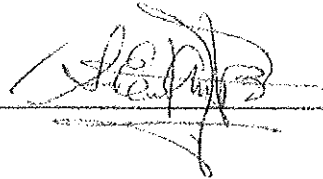
Via VTL
EAN HOLDINGS
14002 E. 21st Street
Tulsa, OK 74134

PLAINTIFF'S VERIFICATION

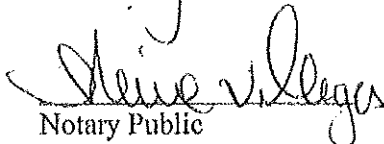
STATE OF NEW YORK }
 } ss.:
COUNTY OF NASSAU }

Sandra Alas Beltran being duly sworn deposes and says:

I am the plaintiff in the within action; and have read the foregoing **COMPLAINT** and know the contents thereof; the same is true to my own knowledge, except as to the matters therein stated to be alleged upon information and belief, and as to those matters I believe it to be true.



Sworn to before me this 12 day
May, 2021


Notary Public

